

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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March 9, 2022

BY ECF and Email

Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Juan Oscar Rosario Lopez
21 CR 322 (PGG)**

Dear Judge Gardephe:

I write to request a temporary modification of Mr. Rosario Lopez' bail conditions to allow him to travel to Philadelphia, Pennsylvania to attend his daughter's wedding this coming weekend. If the application is granted, Mr. Rosario-Lopez will leave New York City on Saturday, March 12, 2022 and return on Sunday, March 13, 2022. He will stay overnight at his daughter's residence. He will provide his Pretrial Services Officer with his itinerary and the address at which he will stay.

On June 14, 2021, Mr. Rosario Lopez was released on bail to home detention with location monitoring. His \$50,000 bond was co-signed by a daughter and his employer. His Pretrial Services Officer reports that although Mr. Rosario Lopez is in compliance with his conditions of release, it is the policy of Pretrial Services to not consent to bail modifications for social requests for individuals on home detention. The Government defers to Pretrial Services.

Mr. Rosario Lopez has been on pretrial release for nine months without one misstep and he has been employed steadily since his release as a deli-man in a bodega. He is a devoted husband, father and grandfather. He has never asked for any modifications of his bail. He does not present a risk of flight and would never jeopardize the financial wellbeing of the co-signers on his bond by violating his bail conditions. His daughter's wedding is a special occasion, and he respectfully requests that the Court permit him to attend.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio, Esq.
Assistant Federal Defender
(917) 612-3274

CC: AUSA Kaylan Lasky by ECF and email.
PTSO Ashley Cosme by email.

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: March 9, 2022